

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**HMD GLOBAL OY,**

**Movant,**

**v.**

**ACACIA RESEARCH CORPORATION,**

**Respondent.**

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**C.A. No. 2:21-mc-00002-JRG**

**JOINT MOTION TO DISMISS**

In the underlying case related to this miscellaneous matter, *Cellular Communications Equipment LLC v. HMD Global Oy*, Case No. 2:20-CV-78-JRG (E.D. Texas), Movant HMD Global Oy (“HMD Global”) and the Plaintiff in the underlying matter, Cellular Communications Equipment LLC (“CCE”) have resolved CCE's claims for relief asserted against HMD Global in that case and jointly filed a motion to dismiss. Accordingly, the parties to this matter, HMD Global and Respondent Acacia Research Corporation (“ARC”) respectfully submit this Joint Motion to Dismiss.

HMD Global and ARC, through their attorneys of record, request the Court to dismiss all claims asserted by HMD Global against ARC without prejudice, and all claims asserted by ARC against HMD Global without prejudice, with each party to bear their own attorneys’ fees, costs of court, and expenses, subject to the Court’s retention of jurisdiction for the limited purpose of enforcing the parties’ settlement agreement.

Dated: March 26, 2021

Respectfully submitted,

<p><u>/s/ Jeffrey R. Bragalone</u> Jeffrey R. Bragalone (lead attorney) Texas Bar No. 02855775</p> <p><b>BRAGALONE OLEJKO SAAD PC</b> 2200 Ross Avenue Suite 4500W Dallas, TX 75201 Tel: (214) 785-6670 Fax: (214) 785-6680 jbragalone@bosfirm.com</p> <p><b>ATTORNEYS FOR RESPONDENT ACACIA RESEARCH CORPORATION</b></p>	<p><u>/s/ Deron R. Dacus (with permission)</u> Deron R. Dacus State Bar No. 00790553 <b>The Dacus Firm, P.C.</b> 821 ESE Loop 323, Suite 430 Tyler, TX 75701 +1 (903) 705-1117 +1 (903) 581-2543 facsimile ddacus@dacusfirm.com</p> <p>Matthew S. Warren (California Bar No. 230565) Jen Kash (California Bar No. 203679) Erika Warren (California Bar No. 295570) <b>Warren Lex LLP</b> 2261 Market Street, No. 606 San Francisco, California 94114 +1 (415) 895-2940 +1 (415) 895-2964 facsimile 20-78@cases.warrenlex.com</p> <p><b>ATTORNEYS FOR DEFENDANT HMD GLOBAL OY</b></p>
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**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(h), (i), I certify that counsel for ARC conferred with counsel for HMD Global via email exchanges and, as reflected in the body of the Motion, the Parties agree to the form and substance of the Motion, the Motion is unopposed, and the parties jointly submit it to the Court.

/s/ Jeffrey R. Bragalone  
Jeffrey R. Bragalone

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Jeffrey R. Bragalone  
Jeffrey R. Bragalone